



EXHIBIT A

110 N. Elgin Ave., Suite 200
Tulsa, OK 74120
(918) 595-4800

Tax ID: 73-0776907

Patrick J. Malloy
pjmiim@sbcglobal.net

Invoice Date: May 20, 2025
Invoice Number: 800808
Billing Attorney: SKS 1921
Matter Number: 017418-00001

Matter: Price Tower

For professional services rendered through May 20, 2025

Fees	28,336.50
Costs	16.50
Total Amount Due	\$28,353.00

Please Remit to:
GableGotwals
110 N. Elgin Ave., Suite 200
Tulsa, OK 74120

Online Payment:
www.gablelaw.com
▪ Client Resources
▪ Pay Invoices

ACH Instructions:
Bank Name: International Bank of
Commerce
Bank Address: 2250 E. 73rd St, Ste 110
Tulsa, OK 74136
(918) 497-2487
ABA Number: 303072793
Account Number: 1603235876
Credit Account: GableGotwals Operating
Account
(Please Reference Invoice Number)

Wire Instructions:
Bank Name: International Bank of Commerce
Bank Address: 2250 E. 73rd St, Ste 110
Tulsa, OK 74136
(918) 497-2487
ABA Number: 114902528
Account Number: 1603235876
SWIFT*: IBCLUS44
Credit Account: GableGotwals Operating Account
(Please Reference Invoice Number)
* ON INTERNATIONAL WIRES THE ABA/ROUTING
NUMBER MUST BE ON WIRE OR THE WIRE WILL BE
RETURNED.

Client: Patrick J. Malloy

Invoice Date:

May 20, 2025

Matter: Price Tower

Invoice Number:

800808

Matter Number:

017418-00001

Professional Services

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/27/25	SKS	Telephone call with Pat Malloy about scope of employment as Special Counsel. (.2) Draft Application to Employ Special Counsel. (.3) Draft Declaration of Sidney K. Swinson. (.5)	1.00	0.00	0.00
01/28/25	SKS	Read and analyze email from Mark Sanders to Pat Malloy about case law interpreting effect of specific performance judgment on whether a contract remains executory, and reply. (.3) Read email from Pat Malloy and reply about risk that sales price will be paid to district court clerk. (.1) Read Offer of Judgment and Plaintiff's Response. (.2) Draft email to Pat Malloy and Mark Sanders with my comments. (.1)	0.70	465.00	325.50
01/28/25	MDS	Legal research regarding executory contract issues (1.2). Prepare memorandum regarding the same (.5).	1.70	445.00	756.50
01/28/25	MDS	Strategic conference call with Trustee and co-counsel regarding legal status and to discuss tasks for proceeding with Section 363 sale of Price Tower. (.5) Follow-up conference with co-counsel (.1)	0.60	445.00	267.00
01/28/25	MDS	Email to prospective buyer regarding legal issues involved in bankruptcy sale.	0.30	445.00	133.50
01/29/25	SKS	Telephone call with John Farley about bankruptcy, to request documentation of his firm's claim, and to discuss pending litigation. (.2) Draft email to John Farley to document request for documents and information. (.2) Read emails from Pat Malloy commending on legal issues. (.2) Telephone call with Pat Malloy. (.2) Telephone call with John Farley. (.2) Read email from Pat Malloy to Ron Brown requesting documents. (.1) Draft email to John Farley. (.2) Read John Farley's reply with contact information for realtor. (.1) Telephone call with Scott Schlotfeld. (.2) Telephone call with Scott Schlotfeld. (.5) Telephone call with Pat Malloy. (.2) Telephone call with Pat Malloy and Scott Schlotfeld. (.4) Telephone call with Pat Malloy. (.4) Telephone call with Scott Schlotfeld. (.2) Read email from Scott Schlotfeld with listing agreement. (.1) Read agreements with Ten-X. (.3) Read email exchanges between attorney for Conservation and Pat Malloy. (.1) Telephone call with Pat Malloy about my conversation with Paul Casella. (.2) Telephone call with Scott Schlotfeld. (.2) Telephone call with Pat Malloy and Mark Sanders about sending letter to art dealer. (.2) Telephone call with Paul Casella and Pat Malloy. (.3) Telephone call with Pat Malloy. (.3) Telephone call with Pat Malloy. (.2) Draft detailed email to Ron Brown about urgent need for information and to provide deadline to agree on Rule 2004 examination. (.2) Review insurance information sent by Scott Schlotfeld. (.2) Draft email to Scott Schlotfeld to request contact information for insurance agent. (.1) Read email from Scott Schlotfeld and forward to Pat Malloy. (.1) Read email exchange between Mark Craige and Pat Malloy. (.1) Telephone call with John Farley about hearing on offer of judgment. (.3) Send email to Pat Malloy to elaborate about issue involving sale. (.1) Review abstract for Price Tower and send comments to Pat Malloy. (.3) Review and revise letter to art	7.00	465.00	3,255.00

Client: Patrick J. Malloy

Invoice Date:

May 20, 2025

Matter: Price Tower

Invoice Number:

800808

Matter Number:

017418-00001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		dealer. (.3) Read email from Pat Malloy about conservancy easement. (.1)			
01/29/25	MDS	Prepare for and participate in strategic conference call with Trustee and co-counsel. (.7) Follow-up exchanges of correspondence with Trustee and co-counsel (1.3)	2.00	445.00	890.00
01/29/25	MDS	Prepare cease-and-desist demand letter to 20cDesign regarding avoidable transfers of personal property. (.8) Exchange correspondence with co-counsel regarding same. (.3)	1.10	445.00	489.50
01/30/25	SKS	Exchange emails with Ron Brown about his illness and to get his permission to get information from his client through the real estate broker. (.1) Draft email to Pat Malloy and Mark Sanders about enforceability of court order. (.1) Telephone call with Mark Sanders regarding the same and to update him on developments. (.2) Draft mail to Steve S. with list of information and documents needed from Cynthia Blanchard. (.2) Telephone call with Pat Malloy regarding same. (.2) Read email exchanges between Pat Malloy and Steve. (.2)	1.00	465.00	465.00
01/30/25	MDS	Review and analysis of background documentation on Debtors' organization, contracts, assets and debts (2.5). Extensive exchanges of correspondence regarding the same with Trustee and co-counsel (.8).	3.30	445.00	1,468.50
01/31/25	MDS	Further review and analysis of background documentation on Debtors organization, contracts, assets and debts (1.7). Memorandum email to Trustee regarding legal implications of same (.8). Extensive exchanges of correspondence regarding the same with Trustee and co-counsel (.5).	3.00	445.00	1,335.00
02/01/25	MDS	Exchange of correspondence with Trustee regarding fiduciary duties and potential consolidation of estates.	0.50	445.00	222.50
02/03/25	SKS	Telephone call with Ron Brown about John Snyder having access to Price Tower. (.1) Telephone call with Pat Malloy about my conversation with Ron Brown and discuss how someone who advances cost of insurance and utilities can have an allowed administrative expense. (.2)	0.30	465.00	139.50
02/03/25	MDS	Exchange correspondence with Trustee regarding advisability of consolidation under the circumstances.	0.50	445.00	222.50
02/04/25	SKS	Telephone call with John Farley to inquire about Note, Mortgage and time records. (.1) Review Note and Mortgage and forward to Pat Malloy. (.1) Exchange emails with Pat Malloy regarding same. (.1)	0.30	465.00	139.50
02/04/25	MDS	Review and analyze information and materials bearing on entitlement of pre-petition broker to commission compensation.	0.20	445.00	89.00
02/05/25	SKS	Read email from Pat Malloy, inquiring about how to obtain funds allowable as an administrative expense, to cover the cost of insurance, utilities and security. (.2) Research. (.5) Draft email to Pat Malloy with my recommendation. (.5) Review docket sheet. (.1) Send email to Ron Brown reminding him that Schedules and SOFA are due today. (.1) Read email exchanges between Mark Sanders and Pat Malloy. (.1) Exchange emails with Pat Malloy about strategy. (.2)	1.70	465.00	790.50

Client: Patrick J. Malloy

Invoice Date:

May 20, 2025

Matter: Price Tower

Invoice Number:

800808

Matter Number:

017418-00001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/05/25	MDS	Exchange of correspondence with Trustee regarding viability of various strategies to preserve the assets without funds on hand.	0.60	445.00	267.00
02/05/25	MDS	Research. (.4) Exchange correspondences with Trustee regarding the best strategy to deal with state court specific performance judgment. (.5)	0.90	445.00	400.50
02/06/25	MDS	Exchange correspondence with Trustee and co-counsel regarding legal strategy on sale and avoidance/recovery actions.	0.70	445.00	311.50
02/07/25	MDS	Continued correspondence with Trustee and co-counsel regarding legal strategy on sale and avoidance/recovery actions.	0.60	445.00	267.00
02/07/25	MDS	Prepare first draft of transfer avoidance complaint vs. 20cDesign regarding Wright artifacts. (1.4) Correspondence with Trustee regarding same. (.2)	1.60	445.00	712.00
02/08/25	MDS	Discussion with Trustee regarding implications of potential estate solvency.	0.20	445.00	89.00
02/09/25	MDS	Review and analyze FLW Conservancy Easement. (.4) Strategic discussion with Trustee regarding ambiguous provisions and implications for survival of easement in the context of organic changes, bankruptcy and sale. (.3)	0.70	445.00	311.50
02/10/25	SKS	Review Mark Sander's email to Pat Malloy about his interpretation of a portion of the Conservancy Easement. (.2) Draft email to Pat Malloy with my comments. (.1) Review email from Pat Malloy about telephone call from Washington County Judge and check docket sheet in both cases pending in Washington County to see what, if anything, may be pending. (.3) Draft email to Pat Malloy to report on my findings. (.1) Review email from Pat Malloy reporting on his conversation with Washington County Judge (.1) Exchange emails with Pat Malloy about requirement for describing in a Notice of sale the personal property being sold. (.2)	1.00	465.00	465.00
02/10/25	MDS	Strategic discussion with Trustee regarding ambiguous provisions and implications for survival of easement in the context of organic changes, bankruptcy and sale.	0.80	445.00	356.00
02/10/25	MDS	Strategic discussions with Trustee and co-counsel regarding potential discussion with state court judge regarding status of specific performance order.	0.20	445.00	89.00
02/11/25	MDS	Review and analyze information and materials regarding history of the Debtor and estate tax implications of disregarded entity status.	0.30	445.00	133.50
02/12/25	SKS	Review letter from attorney for 20c Design. (.1) Forward email to Pat Malloy and Mark Sanders with comments. (.1)	0.20	465.00	93.00
02/12/25	MDS	Review and analyze letter from counsel for 20cDesign responding to demand letter regarding avoidance/recovery of artifacts.	0.20	445.00	89.00
02/16/25	MDS	Review and analyze contract terms correspondence from counsel for potential Stalking Horse bidder. (.3) Strategic discussion with Trustee regarding same, particularly requirement that successful bidder be a non-profit. (.2)	0.50	445.00	222.50
02/20/25	MDS	Review and analyze all relevant Code, Bankruptcy Rule and Local Rule provisions related to sales. (.8) Prepare outline memorandum	1.90	445.00	845.50

Client: Patrick J. Malloy

Matter: Price Tower

Invoice Date:

May 20, 2025

Invoice Number:

800808

Matter Number:

017418-00001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		of alternative procedures for most expeditious bidding and sale procedures. (.8) Exchange multiple correspondence with Trustee.			
02/21/25	MDS	Continued discussion with Trustee regarding preferable bidding and sale procedures. (.3) Provide comments and markup to Trustee's draft of Bidding Procedures. (.6)	0.90	445.00	400.50
02/22/25	MDS	Review and analyze McFarlin's modified Stalking Horse Asset Purchase Agreement. (.3) Provide comments and discuss proposed edits with Trustee regarding asset allocation issues therein. (.5)	0.80	445.00	356.00
02/22/25	MDS	Review and analyze Trustee's second modified Bidding Procedures. (.2) Exchange correspondence with Trustee regarding same. (.1)	0.30	445.00	133.50
02/23/25	MDS	Exchange correspondence with Trustee regarding approach to Bidding Procedures.	0.10	445.00	44.50
02/24/25	MDS	Review and analyze Trustee's Modified Asset Purchase Agreement. (.3) Analyze and exchange correspondence with Trustee regarding asset allocation issues therein. (.3)	0.60	445.00	267.00
02/24/25	MDS	Review and analyze Trustee's Modified Bidding Procedures. (.4) Exchange correspondence with Trustee regarding same. (.1)	0.50	445.00	222.50
02/25/25	MDS	Review and analyze correspondence from Conservancy counsel regarding revised Bidding Procedures and easement modification.	0.10	445.00	44.50
02/26/25	MDS	Review and analyze Trustee's modified Asset Purchase Agreement draft. (.4) Provide comments/edits to same. (.3) Review Trustee's correspondence to McFarlin counsel regarding the same. (.1)	0.80	445.00	356.00
02/26/25	MDS	Review and analyze summary narrative timeline prepared by Debtor's principal.	0.20	445.00	89.00
02/27/25	MDS	Review and analyze news account of potential criminality of creditors/interest holders of Debtor. (.2) Exchange correspondence with Trustee regarding the same. (.1)	0.30	445.00	133.50
02/28/25	MDS	Prepare for and attend 341 exams of Debtor and debtor-affiliate. (1.2) Follow-up correspondence with Trustee regarding affiliate transfers. (.4)	1.60	445.00	712.00
03/01/25	MDS	Prepare strategic email memorandum regarding sale of personalty and recovery actions. (.7) Exchange correspondence with Trustee regarding same. (.1)	0.80	445.00	356.00
03/03/25	MDS	Exchange strategic correspondence with Trustee and co-counsel regarding threatening voice message from third party.	0.30	445.00	133.50
03/04/25	MDS	Begin research and preparation of Motion to Sell certain estate assets free and clear. (.6) Exchange correspondence with Trustee regarding same. (.1)	0.70	445.00	311.50
03/04/25	MDS	Review and analyze proposed Amendment to FLW Conservancy Easement. (.6) Prepare a modified draft of same. (.6) Strategic email to Trustee regarding same. (.5) Multiple exchange of correspondence with Trustee regarding same. (.3)	2.00	445.00	890.00
03/05/25	MDS	Completion of first draft of combination bidding procedure/sale free & clear motion. (1.0) Strategic correspondence with Trustee regarding same. (.2)	1.20	445.00	534.00

Client: Patrick J. Malloy

Matter: Price Tower

Invoice Date:

May 20, 2025

Invoice Number:

800808

Matter Number:

017418-00001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/05/25	MDS	Strategic exchange of correspondence with Trustee regarding his position on a written side agreement between McFarlin and FLW Conservancy.	0.40	445.00	178.00
03/06/25	MDS	Strategic consultation with Trustee regarding proper disposition of check arguably owned by the debtor or affiliate.	0.20	445.00	89.00
03/11/25	MDS	Email discussion with Trustee regarding timeliness and process for contesting ad valorem taxes.	0.20	445.00	89.00
03/12/25	MDS	Review and analyze Debtor's counsel's concerns with proposed bidding procedures and sale structure. (.5) Strategic discussion with Trustee regarding same. (.3)	0.80	445.00	356.00
03/12/25	MDS	Strategic exchange of correspondence with Trustee re scope of FLW Conservancy Easement and its rights via sale. (.3) Prepare memorandum explaining my particular construction of and advise regarding Easement. (1.0)	1.30	445.00	578.50
03/14/25	MDS	Review and analyze Trustee's agenda for call with Debtor's counsel. (.3) Strategic email with recommendation for approaching certain agenda issues regarding sale. (.2)	0.50	445.00	222.50
03/18/25	MDS	Review correspondence from Art Institute regarding Trustee's ability and willingness to loan artwork during administration of case. (.2) Strategic correspondence with Trustee regarding same. (.2)	0.40	445.00	178.00
03/18/25	MDS	Review and analyze proposed draft of 363(f) Motion. (.4) Exchange multiple correspondences with Trustee with suggestions for modification. (.2)	0.60	445.00	267.00
03/25/25	MDS	Review and analyze objection to Bidding Procedures motion and Trustee's proposed response thereto. (.4) Exchange strategic correspondence with Trustee regarding same. (.2)	0.60	445.00	267.00
03/26/25	MDS	Review and analysis of Nelson voice message to co-counsel. (.2) Correspondence to same regarding same. (.1)	0.30	445.00	133.50
03/27/25	MDS	Strategic telephone conference with co-counsel regarding abusive activities of Mr. Nelson.	0.40	445.00	178.00
03/28/25	RJG	Review and analyze Washington County Assessor's records and Treasurer's records regarding the Price Tower tax liability. (.2) Discuss the assessment with staff at the assessor's office. (.2) Research procedures for a potential objection to the assessment. (.2)	0.60	430.00	258.00
03/28/25	MDS	Consultation with R. Getchell regarding viability of ad valorem tax protest/appeal. (.3) Exchange correspondence with Trustee regarding same. (.2)	0.50	445.00	222.50
03/28/25	MDS	Review and analyze Nelson pro se filing (stay of case) (.4). Extensive research and analysis regarding history of Debtor's principals, affiliates and their creditors/investors, and their relation to Debtor (2.0). Prepare memorandum for Trustee regarding same (.7); strategic correspondence re same (.2).	3.30	445.00	1,468.50
03/29/25	MDS	Follow-up correspondence with Trustee regarding 3/28 research project.	0.30	445.00	133.50
03/31/25	MDS	Review and analysis of latest Nelson pro se filing. (.4) Strategic discussion with Trustee regarding same. (.2)	0.60	445.00	267.00

Client: Patrick J. Malloy

Matter: Price Tower

Invoice Date:

May 20, 2025

Invoice Number:

800808

Matter Number:

017418-00001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/25	MDS	Review and analysis of Order to Show Cause. (.2) Exchange correspondence with Trustee regarding same. (.2)	0.40	445.00	178.00
04/01/25	MDS	Review and analysis of Nelson filings. (.8) Strategic email exchange with Trustee regarding best approach to same under existing law. (.5)	1.30	445.00	578.50
04/07/25	MDS	Strategic exchange of correspondence with Trustee regarding advisability of responding to Nelson motions pending resolution of order to show cause.	0.20	445.00	89.00
04/08/25	MDS	Strategic correspondence with Trustee regarding timing and advisability of filing response to Nelson regarding order to show cause.	0.20	445.00	89.00
04/10/25	MDS	Strategic correspondence with Trustee regarding timing and advisability of prosecuting filing restrictions vs. Nelson.	0.20	445.00	89.00
04/15/25	MDS	Review and analyze Nelson filing. (.1) Exchange correspondence with Trustee regarding same. (.1)	0.20	445.00	89.00
04/17/25	MDS	Participate in strategic discussion with Trustee and co-counsel regarding insurance and related matters.	0.20	445.00	89.00
04/24/25	SKS	Read email from Pat Malloy with email from Cynthia Blanchard, and reply. (.1) Read email from Pat Malloy about substantive consolidation and reply. (.1) Research. (.3) Draft email to Pat Malloy to respond to his inquiry. (.1)	0.60	465.00	279.00
04/24/25	MDS	Strategic exchange of correspondence with Trustee regarding advisability of consolidation.	0.30	445.00	133.50
04/25/25	MDS	Follow up exchange of correspondence with Trustee regarding advisability of consolidation.	0.50	445.00	222.50
04/29/25	MDS	Exchange of correspondence with Trustee regarding results of bid process and objections to sale.	0.20	445.00	89.00
04/30/25	MDS	Review and analyze title examiner's requirements. (.1) Exchange of correspondence with Trustee regarding title standards applicable to bankruptcy sale. (.2)	0.30	445.00	133.50
05/06/25	MDS	Review and analyze email and supporting documentation from alleged creditor regarding Debtor's title to Robert Indiana "66" sculpture. (.4) Strategic correspondence with Trustee regarding same. (.2)	0.60	445.00	267.00
05/12/25	SKS	Review Helton's statement, Note and Mortgage. (.2) Draft e mail to Pat Malloy about paying the statement as a secured claim. (.10). Exchange e mails with Pat Malloy to respond to his questions about the validity of the Mortgage signed by the Debtors in favor of the Helton Firm. (.2)	0.50	465.00	232.50
05/19/25	MDS	Preparation of service narrative for fee application.	0.40	445.00	178.00
05/19/25	MDS	Exchange strategic correspondence with Trustee and co-counsel regarding claimants associated with related entities and significance of election of remedies, estoppel, etc.	0.20	445.00	89.00
Total			64.10		\$28,336.50

Client: Patrick J. Malloy

Invoice Date:

May 20, 2025

Matter: Price Tower

Invoice Number:

800808

Matter Number:

017418-00001

Summary of Professional Services

<u>Name</u>	<u>Initials</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Robert J. Getchell	RJG	Shareholder	0.60	430.00	258.00
Mark D. Sanders	MDS	Shareholder	49.20	445.00	21,894.00
Sidney K. Swinson	SKS	Shareholder	13.30	465.00	6,184.50
Sidney K. Swinson	SKS	Shareholder	1.00	0.00	0.00
			64.10		\$28,336.50

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
01/28/25	Online Court Documents		0.20
01/28/25	Online Court Documents		0.20
03/12/25	Online Court Documents		0.30
03/12/25	Online Court Documents		0.40
03/12/25	Online Court Documents		0.30
03/25/25	Online Court Documents		0.20
03/27/25	Online Court Documents		2.70
03/31/25	Online Court Documents		0.20
03/31/25	Online Court Documents		3.00
03/31/25	Online Court Documents		0.70
03/31/25	Online Court Documents		0.20
03/31/25	Online Court Documents		0.70
03/31/25	Online Court Documents		1.50
03/31/25	Online Court Documents		0.20
03/31/25	Online Court Documents		0.30
03/31/25	Online Court Documents		2.60
03/31/25	Online Court Documents		0.10
03/31/25	Online Court Documents		1.00
03/31/25	Online Court Documents		0.10
03/31/25	Online Court Documents		0.20
03/31/25	Online Court Documents		0.10
03/31/25	Online Court Documents		0.10
03/31/25	Online Court Documents		0.10
03/31/25	Online Court Documents		0.40
03/31/25	Online Court Documents		0.20
03/31/25	Online Court Documents		0.50
Total			\$16.50

Cost Summary

<u>Description</u>	<u>Amount</u>
Online Court Documents	16.50

Client: Patrick J. Malloy

Matter: Price Tower

Invoice Date:

May 20, 2025

Invoice Number:

800808

Matter Number:

017418-00001

Description

Amount

Total

\$16.50